

Message

From: Mills, Jason [Mills.Jason@epa.gov]
Sent: 12/10/2021 4:03:00 PM
To: Birchfield, Norman [Birchfield.Norman@epa.gov]; Hodes, Colette [Hodes.Colette@epa.gov]
Subject: Cumulative Risk Review
Attachments: CRA Guidelines Final RAF Review11-10-21_jnm comments.docx; RE: RAF CRA Guidelines Draft Final Review

All,

For your reference, attached is the current draft of the CRA guidelines with my specific comments included, which I plan to submit next week before I am out on leave. I've also attached an email I previously sent to Martin Lawrence outlining my high-level concerns. If you have any additional thoughts or concerns you'd like me to consider before then, let me know.

My biggest takeaways from my review are that 1) despite the title, the primary focus of the document is on consideration of non-chemical stressors; 2) the focus on citing external documents without further synthesizing the information results in the document reading more like a literature review than a unified Agency document; 3) it tries to touch on lot of topics in a short amount of space and so does not adequately explain any individual one; and 4) it explicitly avoids providing any concrete direction and, as a result, raises a whole host of questions about how our office is supposed to apply these "guidelines" in practice.

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